

EXHIBIT P

PAULA LUDWIG Confidential
THE BASU GROUP vs SEVENTH AVENUE

November 18, 2016
11

1 A. Approximately three hours.

2 (Exhibit No. P1 was marked for
3 identification.)

4 BY MR. GILMAN:

5 Q. Let me show you what has now been marked as Plaintiff's
6 Exhibit 1, P1. Have you ever seen this document before
7 today?

8 A. No.

9 Q. So could you identify it for the record, or are you
10 unable?

11 A. It appears to be a complaint from the Basu Group to--
12 versus 7th Avenue.

13 Q. Does 7th Avenue sell goods all over the United States?

14 A. Yes.

15 Q. Does 7th Avenue sell goods into the state of New York?

16 A. Yes.

17 Q. Does 7th Avenue sell goods into New York city?

18 A. Yes.

19 Q. How does 7th Avenue sell its goods into these areas?
20 Meaning do you have brick and mortar stores? Is it
21 catalog? Is it website? Is it a combination of those?

22 A. Catalog and website.

23 Q. No brick and mortar stores?

24 A. Correct.

25 Q. Has it ever had a brick and mortar store?

18, 2016
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*** CONFIDENTIAL ***

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK

3
4 THE BASU GROUP, INC.,

5 Plaintiff,

6 vs.

7 SEVENTH AVENUE, INC.,

8 Defendant.

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X

Civil Action No.:
16-cv-00461-PGG
ECF CASE

13 Deposition of PAULA LUDWIG

14 Friday, November 18, 2016

15 10:15 a.m.

16 At

17 Seventh Avenue, Inc.
18 1112 7th Avenue
19 Monroe, Wisconsin 53566

20
21
22
23 Reported by Sheila K. Fairchild
24
25



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DEPOSITION of PAULA LUDWIG, a witness in the
above-entitled action, was taken at the instance of the
Plaintiff, under and pursuant to the Rule 30 (b) (6),
Federal Rules of Civil Procedure, pursuant to notice,
before me, SHEILA K. FAIRCHILD, Professional Court
Reporter and Notary Public, in and for the State of
Wisconsin, at the offices of Seventh Avenue, Inc., 1112
7th Avenue, Monroe, Wisconsin, on the 18th day of
November, 2016, commencing at 10:15 a.m. and concluding
at 2:10 p.m.

APPEARANCES:

MYERS WOLIN, LLC

MICHAEL R. GILMAN

100 Headquarters Plaza

Morristown, New Jersey 07960

Appeared on behalf of the Plaintiff.

LADAS & PARKY, LLP

DAVID C. BREZINA

224 South Michigan Avenue, Suite 1600

Chicago, Illinois 60604

Appeared on behalf of the Defendant.



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COLONY BRANDS ASSOCIATE GENERAL COUNSEL

TIMOTHY ENGLING

1112 7th Avenue

Monroe, Wisconsin 53566-1364

appeared on behalf of the Defendant.

ALSO PRESENT: Russell Davis, President Seventh Avenue,
Inc.



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